EXHIBIT A

GRIEVANCES BY DONALD WILLIAMS

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF CORRECTION
INMATE GRIEVANCE FORM
FORWARD TO INSTITUTIONAL GRIEVANCE COORDINATOR (IGC)

Name WILLIAMS DONALD **Grievance#** 59845 **Institution** SOUZA-BARANOWSKI CORRECTIONAL

Commit No. W97372 **Housing** J3 **Date Of Incident** 20120603 **Date Of Grievance** 20120605

Complaint On the Above dAte My girlfriends rights were Violated in More Ways then oNe by C.O's And Ips. C.o Pierre locAted some sort of contraband thAt wAs in the Non-Contact visitors room While My girlfriend And Another visitor Were in there.My visit wAs cAncelles 5-10 minutes AFter And My girlfriend wAs brought dowstairs.She hAd her privAcy rights violated by Ips.They Went through her cell phone read All her Text messAges And Went through All her pictures.She was Not Allowed to Answer her phone For 4 hours And our Family Members Were Worried.She wAs told Several times thAt they knew she plAced the contrAbAnd there becAuse the rooms Were seArched before And After eAch visit.Then they told her she was barred.After seArching her cAr And phone And Finding Nothing thAt could link her to this ContrAband.She is Not A prisoner so this was Wrong.

Remedy Requested I Would all the NAmes of every officer And Ips thAt were involved.I Also Want some type of Action to be tAken For there Non-professional WAys And I Would like A heAring For My girlfriend regArding the visits.

Staff Recipient O'Dell Pamela M CPO I

Staff Involved Pierre Lesly CO I

Signature

RECEIPT BY INSTITUTIONAL GRIEVANCE COORDINATOR

Date Received 20120615 **Decision Date** 20120626

Signature O'Dell Pamela M CPO I

Final Decision DENIED

Decision Grievance is denied, issues concerning barred visits are addressed with the Superintendent's office. If your visit is barred, she needs to address her concerns to the Superintendent.

Signature **Date**

Denied grievances may be appealed to the Superintendent within 10 working days of Institution Grievance Coordinator's decision.

INMATE RECEIPT

Name WILLIAMS DONALD **Institution** SOUZA-BARANOWSKI CORRECTIONAL

Commit No. W97372 **Grievance#** 59845 **Date Received** 20120615

Signature. O'Dell Pamela M CPO I

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF CORRECTION
INMATE GRIEVANCE APPEAL FORM
FORWARD TO SUPERINTENDENT

Name WILLIAMS DONALD

Institution SOUZA-BARANOWSKI CORRECTIONAL

Number W97372 **Housing** J3

Appeal Date 29-JUN-12 **Date Of Grievance** 05-JUN-12

Appeal Received Date 09-JUL-12

Appeal Grievance #59845: I'm Writing in regards to My girlFriend being barred and she never Wrote any rules. She has Wrote Several letter's to the Superintendant and has called Several times and no one is contacting her back. She was barred with Several other Visitor's due to some Contraband that was found in the Visiting room but Several of those other Visitors are allowed back in the facility and no one has Contacted My girlfriend (Shekeira Springer) back.

Remedy Requested To at least give My girlfriend (Shekeira Springer) an interview so she can eventually get the barr situation liFted. due to the Fact she has never and will never violate the rules of the Facility.

Staff Recipient O'Dell Pamela M CPO I

Signature __________

DECISION BY SUPERINTENDENT

Appeal Received Date 09-JUL-12 **Decision Date** 20-JUL-12 **Decision** DENIED

Decision By Gelb Bruce I SUPERINTENDENT

Reasons At this time the matter is currently pending investigation

Signature __________ **Date** __________

INMATE RECEIPT

Inmate's Name WILLIAMS DONALD

Institution SOUZA-BARANOWSKI CORRECTIONAL

Number W97372

Appeal Received Date 09-JUL-12

Staff Recipient O'Dell Pamela M CPO I

Superintendent's Signature __________

EXHIBIT B

LETTER TO ANTHONY MENDONSA, SUPERINTENDENT

COPY

1 6·4·2012

Superintendant Mendonsa,

I Am Writing you in regards to my girlfriend being banned For A year last Night regarding Some Contraband they (C.O's) Found in the Non-Contact Visiting room on J-3 Visitor's side. My girlfriend (Shereica Springer) Co-operated in All ways possible. She was held From 8:15 p.m to 12 a.m While her car was searched And she was questioned. She has be coming to this same Non-Contact Visiting room since 8·16·2011 And has never had a problem like this. There was nothing found in her car that could link her to this Contraband And she is willing to give A D.N.A And/or Fingerprint to show And prove that there isn't Any way she could've ever held that Contraband in her hand. I Feel she/we should be given some sort of hearing explaining why she is being banned For A year without violating Any institutional rules. For these reasons I'm Asking For her not to be banned or given A hearing that she could Attend with her Attorney so this can be sorted out As soon As possible. Thank You

Sincerely,

Donald Willis Jr

EXHIBIT C

LETTER TO LUIS S. SPENCER, COMMISSIONER

June 11,2012

I am contacting you due to a serious situation that occurred with me and my girlfriend (Shekeira Springer) on June 3,2012 at Souza-Baranowski. I feel my girlfriends privacy rights were violated by several officers and I believe this is an on going racial thing toward me and now my family.

On the above date my girlfriend came to visit me at 7pm for a non contact visit. she has been doing this since August 16,2011 twice a week for a non contact visit while Im being illegally held in the hole for no reason. She was searched and let in. We were in the visit for about an hour then Officer Pierre let another visitor in to see someone else. Once Officer Pierre came in to check if there was a chair for the visitor he pulled out the chair for her to sit down and noticed a package sitting on the chair wrapped up in what's to believe was saran wrap and duct tape. At this time he let the other visitor into the visit and everything proceeded on as normal for another 10-15 minutes at that time the Officers came in and told all 3 visitors they had to leave. I was then brought into the cold weather on the reck deck where I was stripped searched and left for about 2 1/2 hours in the cold, around 10:30 pm I was brought back into the non contact visiting room and brought to my cell around 11:45pm. I looked into the parking lot and noticed my girlfriends car was still out there. I then noticed her coming out of the building a little while after 12am. i finally got a chance to speak to her today (June 5,2012) and found out why she was held for four hours after she was removed from the visit. She told me several C.o's and Ips sat with her in a room downstairs and questioned her. They would not let her answer her phone or text message while her family and my family were calling to see why she hasn't called anyone after leaving the visit. the state police took her phone went through all her text messages and pictures, that is a major violation of her privacy, she also signed a warrant so her car and bag could be searched, she also told several officers to take her finger prints and the prints off whatever was found just to show that she never had it in her possession, that never happened. The Ips officer told her they know for sure she put that there because the visiting rooms are searched before and after every visit, that is not true. Then she was told that she couldn't come back and she would receive a summons in the mail. now I believe this is not fair , I do know several other white inmates had visits earlier that day and none of there visitors were barred and there's no way of telling when that was placed in the visiting room. My girlfriend went above and beyond to cooperate and was violated in more ways then one and still was punished.

I have filed a grievance and wrote Superintendent Mendonsa to ask for a hearing before a decision is made to bar my girlfriend, I believe the only person or people that needs to be punished/disciplined in this situation is the officers that made my girlfriend uncomfortable by violating her privacy, making smart remarks to her, not letting her answer her phone and keeping her there for hours, she was never under arrest and she is not a prisoner so they (co's and ip's) were suppose to let her answer the phone so our families could know she was alright. I am asking something gets done and the situation gets handled the correct way.

Thank You for your time..

Sincerely,

Donald Williams Jr.

EXHIBIT D

NOTICE OF BARRED VISITOR

The Commonwealth of Massachusetts
Executive Office of Public Safety & Security
Department of Correction
Souza-Baranowski Correctional Center
P.O. Box 8000
Shirley, MA 01464

Office: (978) 514-6500
Fax: (978) 514-6529

Deval L. Patrick
Governor

Timothy P. Murray
Lieutenant Governor

Mary Elizabeth Heffernan
Secretary

Luis S. Spencer
Commissioner
Peter A. Pepe, Jr.
Katherine A. Chmiel
Deputy Commissioners
Paul L. DiPaolo
Acting Deputy Commissioner
Anthony M. Mendonsa
Superintendent

Notice of Barred Visitor

June 4, 2012

Ms. Shaekeira Springer
16 Stockton Street
Dorchester, MA 02124

RE: DOB: 06/14/85 ID#: S83298188

Dear Ms. Springer:

This letter is to notify you that your visiting privileges are suspended effective **June 3, 2012**. This action is taken as a result of:

Attempt to Introduce Drugs into the Facility

You are hereby restricted from entering this or any other Department of Correction Institution or Facility. You may reapply to the Superintendent for reconsideration after **June 3, 2013**. Should you desire to appeal this action, you may do so in writing to the Superintendent within 15 working days of the receipt of this letter. Such written appeal shall include a detailed narrative describing the incident, and set forth the reason you feel the suspension should be lifted. Should the inmate you visit be transferred during the above period, you must apply to the Superintendent of the new institution/facility for re-instatement of your visiting privileges.

Please contact my office at (978) 514-6500 Ext. 6100 if you have any questions regarding this matter.

Sincerely,

Anthony M. Mendonsa
Superintendent

AM/mo

cc: Karen Arruda, Special Operations Division
Visiting Processing
Outer Control
Inmate File (Donald Williams, W97372)
File

EXHIBIT E

APPEAL OF BARRED VISIT BY MRS. WILLIAMS

Mrs. Shakeira Williams
16 Stockton Street
Dorchester, Ma. 02124

Anthony Mendonsa, Superintendent
Office of the Superintendent
S.B.C.C.
P.O. Box 8000
Shirley, Ma. 01464

Dated:

Re: Incident on 6/3/12

Dear Mr. Mendonsa:

On June 3, 2012 I came to your facility to visit my husband, Donald Williams in the SMU. I arrived at the facility around 6:30 p.m., where I was processed and searched. Around 7:00 p.m., I arrived in the SMU area, along with another woman.

While me and she were waiting for our visits to come, an officer came in with another woman for the third booth, he pulled out the chair for her, and found a package of drugs sitting on the chair. He left and then came back and had us all leave the visiting booths. I went downstairs and was asked questions, along with this woman. Then, we were read our Miranda rights. I had nothing to hide, so I signed a waiver form allowing my car to be searched, and I allowed myself to be stripped searched. While that was going on, they said that two more packages were found taped under the desk in that area in the third booth. After all of this, I was told that I am barred from coming to visit my husband.

Sir, I have been visiting my husband for some time now and I have been in compliance with all the rules and regulations. I did not do anything wrong, nor would I risk doing anything wrong to jeopardize me not seeing my husband. The drugs found were not mine, and anyone could have put them there. I am quite sure that there were other visitors to that facility in those booths before myself and this other woman arrived. I know one thing, I didn't put it there, nor did she. I was barred for no reason and I ask respectfully to have my visits reinstated, or at least allow me a hearing and sit down with you.

Thank you for your attention and consideration in this matter.

Sincerely,

Shakeira Williams

cc/file SW

EXHIBIT F

MRS. WILLIAMS LETTER TO COMMISSIONER SPENCER

Mrs. Shekeira Williams
16 Stockton Street
Dorchester, Ma. 02124

Luis S. Spencer
Commissioner of Correction
Department of Correction
50 Maple Street, Suite 3
Milford, Ma. 01757-3698

Dated:

Re: Barred visits

Dear Mr. Spencer:

This is an appeal to you in regards to the barring of my visits by the Superintendent at Souza Baranowski Correctional Center on June 3, 2012.

On that date, I went to visit my husband, Donald Williams at the facility in the SMU. I was in the middle booth area with two other women, when an officer came in the non-contact area and checked the booth area that was empty and found some drugs in the chair area and under the table area. Me and the other two women were removed from the area. I was asked to be searched, which I permitted. I was very cooperative with them because I had nothing to hide, and I did nothing wrong.

I was informed by staff that I was barred from the facility, and that I would be receiving subpoenas in the mail to appear in court. I wrote the Superintendent a letter immediately requesting a hearing. On July 5, 2012, I received a letter stating that I was barred. However, the letter stated that I was not going to receive a hearing, and that I can resubmit in one year.

My appeal is that I did not bring any drugs into this facility. There is no proof whatsoever that I had anything to do with the drugs found in the area in the non-contact visiting booth. Also, there were nine other visitors at that facility visiting prisoners in the SMU that day. Anyone could have placed the drugs there. I have been a law-abiding citizen and I have obeyed the rules and regulations of the facilities I visited my husband at. Not only have I not done anything wrong, I deserve a hearing to state my case to the Superintendent. Therefore, I am respectfully requesting you to overrule the decision of the Superintendent and provide me with a hearing before him. I am being unjustly accused here and deprived of the ability to see my husband.

EXHIBIT G

LETTER OF PRESENTMENT BY MRS. WILLIAMS

Mrs. Shakeira Williams
16 Stockton Street
Dorchester, Ma. 02124

Martha Coakley
Attorney General
One Ashburton Place
Boston, Ma. 02108

Dated:

Re: Letter of Presentment, G.L.c. 258

Dear Mrs. Coakley:

I have been visiting my husband, Donald Williams, at MCI-Cedar Junction and Souza Baranowski Correctional Center ("SBCC") for a long time now without incident. On June 3, 2012 I went to visit my husband at SBCC in the Special Manangement Unit ("SMU") where he is currently being held. I arrived at the facility around 6:30 p.m., where I was processed and searched. I arrived in the SMU area, along with another woman and we sat down awaiting our visits to enter the non-contact visiting area.

While we were waiting, an officer came out in the area to the third visiting booth and pulled out a chair, and there was a package containing drugs in the seat. He pulled out the chair for a third woman who was visiting someone in the SMU also. After this discovery, he left the area, then he returned and had us all leave. I, along with this other woman, was brought downstairs. We were asked questions and I answered all questions truthfully. I had nothing to hide. While these questions were being asked, I believe that they said that they had also found two more drug packages taped under the desk area of the other booth (not the one I was in or the other woman). We were read our Miranda rights, and the State police came and had us sign warrants/waivers to search my car and hers. I complied without any difficulty and I allowed them to strip search me. Nothing was found on me. However, I was told that I was now barred from seeing my husband, and I got a court summons to come to court to face charges for some drugs I had no knowledge about.

I was humiliated by the guards and police, and barred for no reason. I am asking that this matter be investigated by your office. And I plan on suing all parties involved with my inappropriate treatment. I demand that I be paid $100,000.00 for my pain and suffering, and that my visits be reinstated so I can see my husband.

I will respectfully await your reply to this demand letter.

EXHIBIT H

MRS. WILLIAMS FOLLOW UP LETTER TO ACTING SUPERINTENDENT

Mrs. Shakeira Williams
16 Stockton Street
Dorchester, Ma. 02124

Osvaldo Vidal, Superintendent
Souza Baranowski Correctional Center Dated:
Harvard Road
P.O. Box 8000
Shirley, Ma. 01464

Re: Reinstating visiting privilege

Dear Mr. Vidal:

This letter is a follow-up letter to my last one written seeking a hearing with the former superintendent, Anthony Mendonsa. That letter was written over a week ago to this office. However, I received no reply as of yet. Now that you are the superintendent, I would like a hearing with you as soon as possible. I was barred for no reason at all and I would like my visits reinstated so that I can see my husband, Donald Williams and for him to see his child.

Thank you for your attention to this matter.

Sincerely,

____
Shakeira Williams

cc/file SW